

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

2019 APR 25 AM 11: 55

UNITED STATES OF AMERICA

v.

DAREN DEJONG

Defendant.

Docket No. 1:18-cr-10307-MLW

U.S. DISTRICT COURT  
DISTRICT OF MASS.

**AFFIDAVIT OF COUNSEL SUPPORT OF DEFENDANT'S MOTION  
TO PARTIALLY SEAL HIS SENTENCING MEMORANDUM**

I, R. Bradford Bailey, being duly sworn, do hereby depose and state:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts, the State of New York, and the State of New Hampshire.
2. I am also admitted to practice full time in the United States District Courts in the Districts of Massachusetts and New Hampshire and in the Northern, Southern and Eastern Districts of New York. I am also admitted to practice in the United States Court of Appeals for the 1st Circuit.
3. I am the attorney of record on behalf of Daren DeJong ("DeJong").
4. I was present during DeJong's proffer with the Massachusetts Attorney General's Office and took contemporaneous notes throughout. Information relative to the substance of that proffer set forth in the Defendant's *Memorandum in Aid of Sentencing* was derived from those notes accurately and to the best of my ability.
5. DeJong's son is presently employed as a Massachusetts State Police trooper.
6. I have been made aware that DeJong accompanied his wife to a medical appointment at Mass General Hospital in April 18, 2019. Information with respect to her medical diagnosis as set forth in the sentencing memorandum was conveyed accurately to the best of my ability.
7. I respectfully submit the public's interest in the efficient investigation of criminal matters, particularly those involving public corruption, is substantially greater than its interest in the availability of information about those investigations to the extent relied upon by this Court for purposes of its sentencing determinations; there are also concerns about DeJong's son's status as a current Massachusetts State Trooper. I also respectfully submit DeJong's wife's privacy interest in her medical condition likewise outweighs the public's interest to

access that information.

Sworn to under the pains and penalties of perjury this 25th day of April, 2019:

A handwritten signature in black ink, appearing to read 'R. Bailey', written above a horizontal line.

R. Bradford Bailey